

**IN THE UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF DELAWARE**

TERRY L. SNYDER,)	
)	
Plaintiff,)	C.A. No. 04-970(JJF)
)	
v.)	
)	
CITISTEEL USA, INC.)	
)	
)	
Defendant.)	

**APPENDIX TO
PLAINTIFF'S ANSWERING BRIEF
IN OPPOSITION TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

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Dated: December 22, 2006

APPENDIX OF EXHIBITS

Bates No.	Document
B-0001	September 17, 2001 letter from Michael Conaghan of CitiSteel USA to Terri Snyder
B-0002 – 0035	Transcript of conversation between Ms. Snyder and Mr. Harris
B-0036	Email from Terri Snyder to Casters, Melters, Hicks, Rineer, Zalota, Buragino re new ISO procedures; handwritten note on bottom of email re interview for part-time position
B-0037 - 0045	Personal diary with miscellaneous entries
B-0046	Email from Terri Snyder to Jim Ryan dated 1/7/03 with handwritten note on bottom
B-0047 – 0049	Miscellaneous dated handwritten notes
B-0050	Memo dated 3/3/03 from Greg Buragino to Terri Snyder re unacceptable attendance and work performance
B-0051	Email from Terri Snyder to Casters, Melters, English, Zalota dated 3/31/03
B-0052	Email from Terri Snyder to Casters, Melters, Rineer, Zalota, Blauvelt, Yashchenko dated 3/12/03 re ISO
B-0053	Email from Terri Snyder to Casters, Melters, Rineer, Zalota dated 1/27/03 ISO Procedures
B-0054	Email from Terri Snyder to Melters, English re stop cards dated 4/1/03
B-0055	Email from Melters to Terri Snyder dated 3/19/03
B-0056	Email from Terri Snyder to Rineer, Zalota undated
B-0057	Email from Terri Snyder to Rineer, Melters, Zalota, Casters, Hicks, Spectrometer Tech, Scalehouse re Meltshop Procedures Manual undated
B-0058	Email from Terri Snyder to Melters dated 3/31/03
B-0059	Email from Terri Snyder to Melters, Casters dated 1/15/03
B-0060	Email from Terri Snyder to Balan, Buragino, Ford, Harris, Rineer, Yashchenko, Zalota dated 8/28/02
B-0061	Email from Terri Snyder to Melters undated
B-0062	Email from Terri Snyder to Ford, Blauvelt, Patrone dated 3/12/03
B-0063	Email from Randolph Harris to Terri Snyder, Melters dated 3/9/03
B-0064	Email from Melters to Terri Snyder dated 3/17/03
B-0065	Email from Terri Snyder to Rineer, Zalota dated 4/1/03
B-0066	Email from Carmella Patrone to Terri Snyder dated 3/12/03
B-0067 – 0068	Handwritten sexual harassment complaint from Terri Snyder dated 4/8/03
B-0069	Record of meeting with Randolph Harris dated 4/8/03
B-0070	Handwritten notes dated 4/8/03
B-0071	Emails between Terri Snyder and Carmella Patrone dated 4/7/03
B-0072 – 0073	Handwritten note dated 4/9/03

B-0074 – 0078	Transcript with handwritten notes of conversation between Ms. Snyder and Mr. Downie
B-0079 – 0092	Managing Diversity in the workplace – Randolph L. Harris, dated 11/10/01
B-0093 - 0095	“Minutes” of meeting between Greg Buragino, Dennis Ford and Jerry Downie; meeting with Greg Buragino, Jerry Downie and Terri Snyder; meeting with Greg Buragino, Jerry Downie and Randolph Harris dated 4/10/03
B-0096 – 0117	Citisteel USA Sexual Harassment Investigation Checklist
B-0118	Memo from J Downie to T Snyder dated 7/10/03
B-0119 – 0212	Deposition transcript of Terri Snyder dated 5/31/06
B-0213 – 0302	Deposition transcript of Terri Snyder dated 6/6/06
B-0303 – 0335	Deposition transcript of Terri Snyder dated 10/16/06
B-0336 – 0366	Deposition transcript of Jerome Downie dated 7/21/06
B-0367 – 0403	Deposition transcript of Gregory Buragino dated 6/16/06
B-0404 – 0475	Deposition transcript of Randolph Harris dated 6/8/06
B-0476 – 0501	Deposition transcript of Carmella Patrone dated 6/19/06
B-0502 – 0516	Deposition transcript of Edward Vouras dated 9/6/06
B-0517 – 0536	Deposition transcript of Cynthia L. Wright, LPCMH dated 9/6/06
B-0537 – 0558	Deposition transcript of James W Ryan dated 6/15/06
B-0559 – 0583	Medical records of Terri Snyder from Concord Wellness Center
B-0584 – 0585	DDOL Charge of Discrimination dated 4/29/03
B-0586 - 0975	DDOL Div of Employment and Training Fax Cover Sheet from Terri Snyder between 4/14/03 and 6/27/05 to various employers re her search for employment
B-0976 - 0979	November 2, 2006 letter to defense counsel responding to request for plaintiff's employers



September 17, 2001

Ms. Terri Snyder
30 N. Rodney Drive
Wilmington, DE 19809

Dear Ms. Snyder:

We are pleased to offer you the position of Clerk Typist, Melt Shop, at CitiSteel USA, Inc., reporting to Mr. Randolph Harris, General Supervisor, Steelmaking, at a starting salary of \$2,000.00 per month.

This offer of employment is contingent on your passing a Company-paid physical and drug test. Also, you will be required to show evidence of citizenship according to the INS regulations.

Terri, it is a pleasure to welcome you to CitiSteel and we look forward to having you as part of our team.

Sincerely,

A handwritten signature in dark ink, appearing to read "Michael Conaghan".

Michael Conaghan
Personnel Assistant

/bac

Accepted: A handwritten signature in dark ink, appearing to read "Terri L. Snyder".

Dated: A handwritten date in dark ink, appearing to read "September 19, 2001".



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B-0001

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1 MS. SNYDER: (inaudible) -- I don't have to consult with somebody every move I
2 make, right.

3 MR. HARRIS: (inaudible voice in background.)

4 MS. SNYDER: Yeah, I'm trying to get you in trouble (inaudible) about floor tiles,
5 I know. You know what I mean. I want you to be yelled at over floor tiles. That's what's going
6 through your mind.

7 MR. HARRIS: That's pretty hard. Not knowing what the hell is going on --

8 MS. SNYDER: Well, well, I'm tired of hearing about it -- or tired of you trying --

9 MR. HARRIS: -- you don't care --

10 MS. SNYDER: -- something new everyday to just play your little games with.

11 You got the junk pile. Let's see, now you got me talking to Dennis --

12 MR. HARRIS: I said to you if you're talking to Dennis about this job --

13 MS. SNYDER: -- Dennis was talking to me about it. See, you don't hear Dennis'
14 life (inaudible) -- I don't.

15 MR. HARRIS: I don't either.

16 MS. SNYDER: I'm loud. You hear me. What I notice --

17 MR. HARRIS: (yelling over one another).

18 MS. SNYDER: (inaudible) -- what do you mean the report says Dennis.

19 MR. HARRIS: Well, I said maybe he (inaudible).

20 MS. SNYDER: It's a problem I don't need. Now what's that sound like to you.

21 I'm a problem. Maybe you're a problem.

22 MR. HARRIS: (inaudible)

23 MS. SNYDER: Is there anything else you wanted to say.

1 MR. HARRIS: No, I don't.

2 MS. SNYDER: Good. 'Cause every time you do want to discuss something, it's a
3 problem.

4 MR. HARRIS: (inaudible) -- it's okay --

5 MS. SNYDER: -- you can tell me to go and I'm out of here with no problem.

6 MR. HARRIS: Okay. Is that what you want me to tell you to do.

7 MS. SNYDER: Hey, if I didn't want to be here, I wouldn't have been here. And I
8 wouldn't have stayed here. But I'm not gonna keep, listening to your shit over, because of floor
9 tiles. What it all boils down to is them floor tiles. It's -- you know. It's horse shit, is what it is.

10 MR. HARRIS: Floor tiles.

11 MS. SNYDER: Yeah, because everyday -- well, let's see Friday, Friday --

12 MR. HARRIS: -- floor tiles.

13 MS. SNYDER: -- you (inaudible) about shit. How could you have forgot about it
14 'cause you been moving around with an attitude ever single day since.

15 MR. HARRIS: No, I haven't.

16 MS. SNYDER: Yes, you have. You want me to bring my diary in. Yes, you have.

17 MR. HARRIS: (inaudible)

18 MS. SNYDER: (inaudible) -- you wait till 1:30, 2:00 (inaudible) job description.

19 You didn't say, good morning, you didn't say shit. So, what do you call -- what kind of
20 supervisor is that. (inaudible) --

21 MR. HARRIS: I have some things on my mind. I do got some things on my mind.

22 MS. SNYDER: Well, that's your personal issue --

23 MR. HARRIS: -- exactly.

B- 0003

1 MS. SNYDER: -- I see you running around, running your mouth to everybody else,
2 though. Nice, neatly, nicely, calmly, loudly. (inaudible) – you have nothing to say, ‘cause this
3 employee –

4 MR. HARRIS: -- yesterday, don’t be hollering at you. Then you turn around and
5 you raise your voice –

6 MS. SNYDER: I’m just a loud person, that’s all.

7 MR. HARRIS: That’s what I’ve been trying to explain to you. But I never said to
8 you don’t yell at me. But then when I started talking to you, oh, don’t yell at me.

9 MS. SNYDER: So now you don’t like being yelled back at.

10 MR. HARRIS: It’s okay.

11 MS. SNYDER: Um-hum.

12 MR. HARRIS: It’s okay, Terry, you know I mean.

13 MS. SNYDER: If you say so, you’re the boss.

14 MR. HARRIS: No, I’m not the boss.

15 MS. SNYDER: Sure you are.

16 MR. HARRIS: No, I’m not. No, I’m not, Terry. I’m an employee here, just like
17 everybody else. Here trying to make a living. What time you leaving today.

18 MS. SNYDER: Well, let’s see. I left in forty minutes. From 10:30 to 11:10, so I’ll
19 say forty minutes. So that would be 3:10, right.

20 MR. HARRIS: (inaudible) – I’m almost afraid to say anything to you anymore.

21 MS. SNYDER: I think that every time you say something, it’s obnoxious, you’re
22 rude, bullshit.

B- 0004

1 MR. HARRIS: I'm not rude to you, Terry. I think I'm kinda nice to you and ask
2 anybody I've ever dealt with --

3 MS. SNYDER: -- wait a minute (inaudible)

4 MR. HARRIS: (inaudible) -- why does she get away with all this.

5 MS. SNYDER: Wait a minute. I don't care what anybody thinks she says. Why
6 don't, you think, you think you've never been rude to me.

7 MR. HARRIS: Okay, Terry. Then I --

8 MS. SNYDER: Yeah, yeah, I thought so.

9 MR. HARRIS: If you think I've been rude to you, then I (inaudible) apologize.

10 MS. SNYDER: You've apologized many times, but you still kept repeating
11 yourself every time. In your actions and your words.

12 MR. HARRIS: You think that I've actually been rude to you.

13 MS. SNYDER: You don't think from -- when you asked me to come in to work
14 Saturday, right. And you said, oh, and by the way, wear a dress with no panties -- (inaudible) --
15 you don't think that was rude. You don't think that was rude for you to (inaudible) -- I think it is.
16 I think you tend to be nice one minute, come in one way, oh, you're so pretty, you make my day.
17 And next minute, you're flipping out, crying like a baby for a week 'cause of floor tiles.

18 MR. HARRIS: Now, Terry, I don't know about that.

19 MS. SNYDER: You don't know about what. You don't think that's rude. Or is
20 that not job related so that shouldn't matter whether it's rude or not. I think that's rude. Oh, and
21 then the next day you want to tell me not to bother to come in after you've dashed out of here
22 laughing. (inaudible) -- I think that's rude. Yeah, I think it's rude, oh, don't bother coming in.
23 And then Thursday you remind me not to come in. Well, I'm waiting for you to remind me, so

1 you, forget you done told me not to, 'cause you dash around so fast. Okay, what. You're
2 standing there (inaudible) -- you don't know if that's weird or not. What's there to say, that you
3 asked me, you said I think I've been nicer to you than anybody here. Well, I think that's a little
4 rude. I think you've been rude to me many times and you think it's okay, or not.

5 MR. HARRIS: I don't think it was rude -- I don't think --

6 MS. SNYDER: You don't think it was rude saying that to me.

7 MR. HARRIS: -- (inaudible)

8 MS. SNYDER: Saying that to me, you don't think that's rude.

9 MR. HARRIS: You know what I think, Terry, I don't think it's being rude.

10 MS. SNYDER: Oh, I don't -- I (inaudible) -- dash out of here and tell me to wear a
11 dress with no panties to work, then the next day you tell me not to --

12 MR. HARRIS: I'm not gonna comment on that.

13 MS. SNYDER: Yeah, I don't think --

14 MR. HARRIS: -- I don't think you should say that.

15 MS. SNYDER: Think I should say what. You asked me a question. You say that
16 doesn't sound rude to you. And I answered your question. I think, yes. Yes, you have been.

17 MR. HARRIS: (inaudible)

18 MS. SNYDER: Wait a minute. I don't see how you can say it to me last Tuesday
19 when you asked me to come in.

20 MR. HARRIS: (inaudible)

21 MS. SNYDER: Well, I whispered that part. (inaudible) Hmm. I whispered that
22 part. Now, that was nice of me, to whisper that part. Right. You don't hear me running around
23 screaming that.

1 MR. HARRIS: Terry, if you think – (inaudible)

2 MS. SNYDER: You can yell at me all you want. That's part of your job, you yell
3 at everybody else. But I thought I was doing a nice thing, I think, you know, I think I'll never
4 send to Ron an email concerning anything regarding safety at all without going to the (inaudible)
5 – okay, I, I didn't realize. I should have thought before I typed. I should have thought before I
6 typed. But how about this (inaudible) – you don't have a problem. Like you're yelling at me. I
7 think you (inaudible) – I've been nicer to you than anybody here. I think not. You've been nice
8 to me in your mind, in your way. I think you've been rude in a way we both know how. So,
9 there –

10 MR. HARRIS: -- (inaudible) – me too.

11 MS. SNYDER: How. When. I'm not, by not wearing (inaudible) panties to work
12 – I know, I know an example.

13 MR. HARRIS: (inaudible) – stay there.

14 MS. SNYDER: Why did you ask me to. Why did you tell me that and blast out
15 laughing. I felt like teasing ya – what.

16 MR. HARRIS: Why would you say something like that.

17 MS. SNYDER: Say something like what. I'm listening, that's why. I (inaudible) --
18 I didn't make you nervous. (inaudible) – standing out there. Nobody can hear that part. Did I
19 yell that, did I say that in your office. I didn't say that in your office, now, did I. That's rude.

20 MR. HARRIS: (inaudible) – any conversation –

21 MS. SNYDER: You ain't gotta have no kind of conversation with me. You asked
22 me a question and I'll answer you, period.

23 MR. HARRIS: (laughing)

1 MS. SNYDER: Yeah, it's really funny, isn't it.

2 MR. HARRIS: No, wait a minute. That's not what I'm laughing at, Terry.

3 MS. SNYDER: Yeah, I know. I know. I know.

4 MR. HARRIS: You know what --

5 MS. SNYDER: -- what are you laughing at. What the hell are you out there

6 laughing at then. I don't think I should have to come here and argue with you because, that you

7 have a problem and you've had it for a week.

8 MR. HARRIS: (inaudible)

9 MS. SNYDER: Everything, no, I don't want nothing. That's all right.

10 MR. HARRIS: Here.

11 MS. SNYDER: What's that, my walkin' papers. All right. Hold on. What's that.

12 MR. HARRIS: Do you think that I've been rude to you, Terry. I'm sorry. I

13 apologize.

14 MS. SNYDER: You apologize the day you come in after your (inaudible) -- I'm

15 sorry, I didn't realize it. The intelligent man you are and you don't realize it. And I'll tell you,

16 don't bother apologizing 'cause you're still gonna do it.

17 MR. HARRIS: Oh, no, no no.

18 MS. SNYDER: Well, wait a minute. Yeah, yeah, yeah, yeah, yeah, yeah. Oh, wait

19 a minute, we can't talk about that, but yet we can talk about fucking floor tiles and, and the junk

20 pile. These little dumb petty things. I thought I was doing good. You know what I mean. I'm

21 not trying to hurt nobody. Like (inaudible) floor tiles. And then, then, oh, excuse me. Then you

22 want to say what are you trying to do me, then you start to (inaudible) -- yeah, I send Mr. Ryan,

1 listen to this, I send to Ryan a fucking email about floor tiles because of the way you talk to me.

2 Does that make any sense to you. No.

3 MR. HARRIS: Okay.

4 MS. SNYDER: And you're running around with this little paranoid clicker thing in
5 your head and then you want to be in a shitty-ass mood all week with me. I can deal with it
6 (inaudible) – every day. Right.

7 MR. HARRIS: Then I'm gonna say something.

8 MS. SNYDER: What. No, I am right.

9 MR. HARRIS: Okay, Terry. You're right.

10 MS. SNYDER: Thank you. Other than that, no, you've never been rude.

11 MR. HARRIS: All right.

12 MS. SNYDER: Other than that horse shit you talk.

13 MR. HARRIS: (laughter)

14 MS. SNYDER: You know, but –

15 MR. HARRIS: Well –

16 MS. SNYDER: That's something we've overcome. I know you'll work on it. That
17 doesn't have nothing to do with my job description (inaudible). You know what I mean, you're
18 just trying to pick at every little thing.

19 MR. HARRIS: I'm not trying to pick at everything –

20 MS. SNYDER: You're trying to pick at every little thing now. Dennis, Dennis
21 spoke -- look how hard it is for me to get fired. For me to lower my voice. Loser and I have an
22 argument all the time, hoping that – my god, you're so loud. Carmella even asked me to lower
23 my voice before. I mean, I am loud.

1 MR. HARRIS: (inaudible) – I’ve seen a side of you that I, I think, I don’t –

2 MS. SNYDER: Oh, you ain’t seen half of – shit, oh, yeah. Oh, yeah. Oh, I can be
3 – oh, yeah. Oh, oh, I can be a black panther too. Just like they all want to run around here
4 calling – the, the black panther, I can be one too. That’s right. (inaudible) and, and Tom. We’re
5 hyper people and we’re loud people. You, you have to admit. When he – no, he asked me, he
6 asked me –

7 MR. HARRIS: -- telling me not to yell at you if you understand how I am and the
8 way you are.

9 MS. SNYDER: Why you yell at me. I say I got the right to yell, too.

10 MR. HARRIS: Yeah, you do.

11 MS. SNYDER: You see, you just push, you gonna sit there and push my buttons,
12 no one is gonna irk me and get me rowled up to yell back at you because of Ford. Ford asked me
13 about my (inaudible) – you know.

14 MR. HARRIS: -- say something too, Terry.

15 MS. SNYDER: What do you want me to do, say none of your business.

16 MR. HARRIS: No, no, no, no. (inaudible)

17 MS. SNYDER: No, because he doesn’t tease me about (inaudible) – inventory,
18 what.

19 MR. HARRIS: I know. I know.

20 MS. SNYDER: Ford is my boss too. I don’t understand that.

21 MR. HARRIS: Right. And I know –

22 MS. SNYDER: So, well. Got something in my eye.

23 MR. HARRIS: I apologize. I don’t want this weekend (inaudible) – think about it.

1 Monday. No. I'm gonna think about Monday, I'm trying to do, I see, need to be (inaudible)

2 MS. SNYDER: You want to holler at me.

3 MR. HARRIS: (inaudible) – you probably think you're helping me.

4 MS. SNYDER: Oh, so there's more things you want to holler at me for than what
5 you do.

6 MR. HARRIS: No, no, no.

7 MS. SNYDER: Tell me if I'm doing something wrong.

8 MR. HARRIS: No, no. Terry, let me tell you something. I want to bragged on
9 you ever since you been. That office has been more organized now than it ever has been.

10 MS. SNYDER: Thank you very much.

11 MR. HARRIS: Oh, it has, believe me, I know. Yeah.

12 MS. SNYDER: Because if you (inaudible) have to tell me that. And if you thought
13 I was trying to hurt you by sending up –

14 MR. HARRIS: I did. I really thought –

15 MS. SNYDER: You thought because of the way you --

16 MR. HARRIS: (inaudible)

17 MS. SNYDER: -- you thought because of the way you talked to me, talked nasty to
18 me. You, this, if this all went to your head. And, tell me if I'm wrong. (inaudible) -- is it
19 because of the way I talk to you. Why would, listen to this. Why would Terry send a floor tile
20 female because I talk nasty to her. Because I ask her out. Does that make any sense to you.

21 MR. HARRIS: I, it doesn't make sense.

22 MS. SNYDER: Okay. Well, why would you come up with that.

23 MR. HARRIS: I thought that was (inaudible)

1 MS. SNYDER: Floor tiles.

2 MR. HARRIS: Yeah. -- said it was. Maybe what I need to do is just --

3 MS. SNYDER: Boy, you're upset.

4 MR. HARRIS: Serious.

5 MS. SNYDER: What (inaudible) -- tell me where it doesn't -- you don't think that's

6 rude. I think it's rude. Okay. Okay. Be quiet here. But you still never (inaudible whispering).

7 Now I know why. You feel bad.

8 MR. HARRIS: (laughter)

9 MS. SNYDER: That's not funny. You feel bad (inaudible) -- and fuck with her.

10 You know what I mean. And this is her, not only (inaudible) and this and that. You told me here

11 a couple times during the middle of the night. I mean, and you knew, --

12 MR. HARRIS: I appreciate --

13 MS. SNYDER: You know what (inaudible) -- no, all that's besides the point,

14 anyway, you know. You just, you know. You don't say good morning, you don't talk to me like

15 an employee. You hardly, you just whiz right on by, you know what I mean. Oh, and you loved

16 it when that can of soda got knocked over earlier. Oh, you, oh, you, oh, yeah, you do.

17 MR. HARRIS: Terry, don't say that.

18 MS. SNYDER: Yeah. Uh-huh. You (inaudible) -- shut down the whole PC and

19 everything else. You and that little --

20 MR. HARRIS: -- don't, don't, don't do that.

21 MS. SNYDER: You and that little --

22 MR. HARRIS: -- don't do that.

1 MS. SNYDER: You got to be crazy. Other pricklers goin' up there. Where –
2 (laughter). Oh, you just slid down, routed through your paper and talked about your grade while
3 soda is, like, gettin' ready to go under the computer and on the mouse and you know what I
4 mean. I understand trying to (inaudible) – you answered my question. Yes. Here's the mouse
5 (inaudible).

6 MR. HARRIS: Terry, if I go –

7 MS. SNYDER: -- and then you just mosey right on out. Then you want to come
8 back in and ask me if he should be my boss 'cause of my job description. Does that make sense.

9 MR. HARRIS: (inaudible) -- and picked up your PC and start helping you wipe
10 the stuff you would have probably bit my head off.

11 MS. SNYDER: Why would I do that.

12 MR. HARRIS: I don't know. I don't know where you're comin' from anymore.

13 MS. SNYDER: Well, I was (inaudible) – your papers –

14 MR. HARRIS: You come in the door and I'm sitting here trying to smile at you to
15 try, okay, Terry, so –

16 MS. SNYDER: No, you're laughing 'cause you think it's funny because you know
17 what buttons of mine to push and you know about coming in here and saying, well, maybe Ford
18 ought to just be your supervisor. You know that's gonna wound me up and what are you saying
19 it for. You have no reason to come up with this stuff.

20 MR. HARRIS: 'Cause you know why. I think it is the way that you can treat me.

21 MS. SNYDER: Me.

22 MR. HARRIS: Yeah. The way you been treating me (inaudible) – well, maybe –

23 MS. SNYDER: I have been rotten right back to you.

1 MR. HARRIS: You have been.

2 MS. SNYDER: That's right.

3 MR. HARRIS: You're rotten —

4 MS. SNYDER: What's good, what's good for the goose is good for the gander.
5 Didn't your mama ever teach you that.

6 MR. HARRIS: You've been pretty rotten with me, Terry.

7 MS. SNYDER: Well, you've been not such a nice guy yourself.

8 MR. HARRIS: You know what, you've been hurting my feelings too.

9 MS. SNYDER: Oh, how is that.

10 MR. HARRIS: Oh, yeah, you have been. You're bad.

11 MS. SNYDER: What, disrespecting my boss.

12 MR. HARRIS: No, I don't know. But just —

13 MS. SNYDER: I think that's been rude of me. But, then, again, I've gotten
14 disrespected (inaudible).

15 MR. HARRIS: (inaudible — you don't.

16 MS. SNYDER: So what. I have a right to disrespect you (inaudible). — just that
17 nobody is around and nobody can hear it. Me, I fly off the handle like a little fruit cake. When
18 I'm stickin' up for myself, and you know it. So, and I said to you the other day, you want to
19 make amends. Right.

20 MR. HARRIS: I do.

21 MS. SNYDER: I said, Ed, I handed you a piece of gum and then the next day there
22 was something else. I say that son of a bitch. I, I can't remember what it is (inaudible
23 whispering) — oh, yeah, I gotta have two men on that so (inaudible).

1 MR. HARRIS: (inaudible) -- can I make amends with you now.

2 MS. SNYDER: Yeah.

3 MR. HARRIS: Seriously.

4 MS. SNYDER: Okay. Okay. Then. Okay. So you go back to yourself and I'll go
5 back to myself.

6 MR. HARRIS: Don't. I'm serious.

7 MS. SNYDER: Well, you were wrong and you took advantage of that fact. You
8 had (inaudible), Terry. Please don't ever send the (inaudible). Instead, you yell -- this actually is
9 the worst time you yell at me. I am usually happy and I wanna come, even come up in this dirty
10 place, you know what I mean. It's, it's, you like, automatic in my life, you know what I'm
11 saying. You (inaudible) -- and then we'll be like (inaudible). Hopefully (inaudible), but that's
12 beside the point --

13 MR. HARRIS: Terry, I, I --

14 MS. SNYDER: -- you yelled at me. I thought I was doing something rude and you
15 yell at me at 7:30 in the morning. Wow. Right in front of everybody, instead of coming to me
16 now, like this, or like (inaudible) and just trying to talk to me. Now, see how for awhile I'll, I do
17 have a, a loudness problem. Maybe I have a hearing problem.

18 MR. HARRIS: (inaudible)

19 MS. SNYDER: Did you run around crying like a big baby.

20 MR. HARRIS: Yeah, I think I have. I think --

21 MS. SNYDER: So you admit you run around crying like a big baby with your little
22 paranoid state going on, yeah. Um-hum. I think you're a little white there. No, I haven't gone
23 (inaudible) this past week. If I'd been lazy, if I don't like any of you people, I wouldn't be able

1 to, I would tell you, all of you. And actually, you know what, I feel sorry for (inaudible)
2 because, you know, I thought he has a problem being so rude to me with everybody, but
3 his way and that's his job. There's not a sole here that never, ever has said one nice thing about
4 that man.

5 MR. HARRIS: -- but I do. (inaudible) -- he has -- (inaudible)

6 MS. SNYDER: He never asked that. You said a what.

7 MR. HARRIS: He said a problem (inaudible). He comes to the conclusion --

8 MS. SNYDER: He was like conning me for a -- I don't want to stick out like a sore
9 thumb. I don't want my own parking space. I don't need my own parking space.

10 MR. HARRIS: (inaudible)

11 MS. SNYDER: That's fine. Let me tell ya -- okay. Here's another thing. Wait a
12 minute. That's what it was. That's the day I brought the piece of gum then, I said you wanna
13 make amends and I left. I get out in the parking lot and found that note. You said okay, bring it
14 in, blah,blah, blah. I bring it in, after your morning meeting, you come back up here, this is what
15 you, this is what you say, do you remember your, this is --

16 MR. HARRIS: What did you want me to do.

17 MS. SNYDER: What do you want me to fuckin' do with this, Terry. This is how
18 you're holding it. You're holding it like it's a snake. Right. Hold on, listen to me. Check it out.
19 And I'm sitting here and I'm thinking he's crazy. You tell me to bring it in.

20 MR. HARRIS: Right, and then --

21 MS. SNYDER: -- and then it's like you're all upset all over again. Over somebody
22 else leaving a note on my car. And I thought I was doing the right thing again by telling you
23 because you're my boss. Now, listen to this. If you would have found out, if you would have

1 found a rumor that somebody put that note on my car, you, you would have been mad at me and
2 you would have said why didn't you tell me.

3 MR. HARRIS: Exactly. And -- I had to confirm that that's what --

4 MS. SNYDER: You could have threw that note away. As long as I know I told
5 you --

6 MR. HARRIS: -- but then that's why I had to report that you told me, and I had to
7 take it a step higher --

8 MS. SNYDER: Let me ask you this. You never reported yourself, why you gonna
9 report a fucking note. That's a really good question. So, you know what I mean. Nobody's
10 perfect. I sent an email, I'm thinking of others, and CitiSteel, and, wait a minute, and I think I'm
11 doing the right thing by telling you about the note, or, yeah, you're this highly intelligent man
12 and you seem to think there's no wrong since you've met me in the way you're behavior is with
13 me. You see no wrong in that. Do you report that, no. You didn't have to report that dumb
14 note.

15 MR. HARRIS: I'll tell you what, I wold --

16 MS. SNYDER: -- you didn't have to report that dumb note.

17 MR. HARRIS: I would (inaudible)

18 MS. SNYDER: What, the note.

19 MR. HARRIS: (inaudible)

20 MS. SNYDER: I said have you ever reported yourself.

21 MR. HARRIS: (inaudible) -- report myself, no.

1 MS. SNYDER: You do what you gotta do. You just throw it away, or you can
2 report it. The (inaudible) with the note. You think I care to – I don't think there's nobody here
3 that wants to hurt me. I'm nice as shit to everybody.

4 MR. HARRIS: You think I want to hurt you.

5 MS. SNYDER: I don't think you want to hurt me. No, I don't. I think you should
6 be angry with other employees are talking or asking me to look up something for them or things
7 like that. That's doesn't seem right, you know what I mean. That's part of my job is to assist
8 employees. This is my job description.

9 MR. HARRIS: Assist the supervisors, it's true. But how –

10 MS. SNYDER: What do you want me to do, tell them no.

11 MR. HARRIS: I'd much rather be –

12 MS. SNYDER: -- well, that's what happens and then I end up doing it anyway for
13 the supervisors or –

14 MR. HARRIS: Terry, don't, I'm tell you. You don't know and it's only from past
15 experience. (inaudible) – and you take care of it.

16 MS. SNYDER: Ah, when do you just take care of it.

17 MR. HARRIS: Well, but, I'm just saying, and –

18 MS. SNYDER: I make a phone call for him.

19 MR. HARRIS: Right. Sometime I think you handle it in a way that we're, it's the
20 way it should be handled. What my concern is, that once you supposed to be handling
21 something and it don't get handled right, then it's gonna fall back on you. You know what –

22 MS. SNYDER: I don't do nothing unless I'm told to.

23 MR. HARRIS: Yeah, but, Terry –

1 MS. SNYDER: I don't do nothing --

2 MR. HARRIS: -- these fellows around here are smart enough, Terry. They are
3 smarter than I am.

4 MS. SNYDER: They are not -- you think I'm gonna put --

5 MR. HARRIS: -- regulations about what to do --

6 MS. SNYDER: -- listen to me. (inaudible) -- cut by the time they ask me a
7 question. So, there is no possible way on this earth that I can accommodate them, where their,
8 their getting over on me, or CitiSteel, as far as -- I have never entered anybody's hours beside
9 you, Ford, I did Jeff's, myself and for maintenance.

10 MR. HARRIS: (inaudible)

11 MS. SNYDER: Did I do Richard. I didn't even do Richard Green. I have never
12 entered anybody.

13 MR. HARRIS: -- hours out there because you're (inaudible)

14 MS. SNYDER: Well, that's right. That's good.

15 MR. HARRIS: -- supervisors putting their time in because now they know who's
16 leaving early, who's coming in late, you know what I mean.

17 MS. SNYDER: Most I do is pull up and show them, or I'll call Ron, I call the
18 supervisor, get a hold of the supervisor and they go back out and they look for the supervisor.
19 They go back out, or they call him on the (inaudible) -- supervisor comes over, then I'll make the
20 phone call for him, then they get on the phone, however it goes. I don't do nothing like that.
21 (phone ringing) (inaudible), Terry speaking. Um, well, I didn't pick up mail yet. No, I put his
22 pay stub in your mailbox yesterday and I wrote, you know, mail on it, because it, the pay check

1 is from yesterday to pay stub, because his supervisor said for it to be mailed to his home. Is that
2 what you were talking about. Okay. All right. Bye.

3 MR. HARRIS: (inaudible) – off the desk yesterday.

4 MS. SNYDER: -- (inaudible) same time, our client didn't fill these out at all.

5 MR. HARRIS: (inaudible)

6 MS. SNYDER: I filled mine in.

7 MR. HARRIS: (inaudible) the last two.

8 MS. SNYDER: Um, they're right, if you want to look at them.

9 MR. HARRIS: (inaudible)

10 MS. SNYDER: I wrote a note. Oh, well, Martinez has some crazy note on here.

11 He wants to know why he's getting a shirt. So, I figured I ought to let (inaudible) – Okay. And I
12 wanted to ask you about (inaudible). His deputy resigned (inaudible) – on there, well, somebody
13 marked it in red –

14 MR. HARRIS: I did.

15 MS. SNYDER: So he is to get one.

16 MR. HARRIS: Yep.

17 MS. SNYDER: Well, why does his (inaudible)

18 MR. HARRIS: 'Cause I, I wrote it back in there. Somebody scratched his name
19 out. That's why I wrote it in red.

20 MS. SNYDER: Now, is life size more highlighted for a reason.

21 MR. HARRIS: Oh, yeah, that's right. Okay. I'm not sure if he get one. He had
22 an accident.

23 MS. SNYDER: So don't turn it in.

1 MR. HARRIS: Until Monday. Remind me on Monday, okay. That's all
2 (inaudible).

3 MS. SNYDER: Now --

4 MR. HARRIS: What should I do (inaudible).

5 MS. SNYDER: Quit running around funny. Go back to your normal self.

6 MR. HARRIS: No, you don't like me (inaudible).

7 MS. SNYDER: See, that. Now, do you see me hollering and screaming at you
8 because that may not be right. See. 'Cause (inaudible) wrong, why, you know, I don't argue
9 with you all doggone week about it. But everyday I even offer to make amends and you still
10 (inaudible) -- because

11 MR. HARRIS: -- barking at me all week.

12 MS. SNYDER: No, you have been.

13 MR. HARRIS: -- (inaudible) --

14 MS. SNYDER: You have been. Don't make me love you.

15 MR. HARRIS: -- what, what can I do to try to say to her, you know, I --

16 MS. SNYDER: -- do you think I'm gonna be pleased with you thinking I sent a
17 floor tile email because of the way you talk to me. No. Number one, that pissed me off right
18 there.

19 MR. HARRIS: (inaudible) -- talk to you like that, I'm sorry.

20 MS. SNYDER: No, no. No, no, no, no, no. You think I sent the floor tile email
21 because of your nasty way.

22 MR. HARRIS: (inaudible)

1 MS. SNYDER: You asked me to come in and work Saturday and then you say, oh,
2 by the way, (inaudible) and you run out of here laughing. You don't think that's nasty. Well, I
3 (inaudible) piece of candy, I offered you gum.

4 MR. HARRIS: (inaudible) candy, (inaudible)

5 MS. SNYDER: Well, right, right. This is CitiSteel. Your probably, I don't, ah, no,
6 this (inaudible)

7 MR. HARRIS: (inaudible)

8 MS. SNYDER: Fun. So, and now I try to give you a piece of gum and you came in
9 arguing with me about the note being on my car, blah, blah, blah. Then you say (inaudible)
10 talking to me. Thank you. You spent all day Friday not talking to me. Then you want my job
11 description. You think I'm gonna be pleased with. You're out of real fun (inaudible). You
12 didn't say one word to me until 1:30 on Friday. On fucking February the fucking 10th. You are
13 not going to say one dam word, oh, you call and said, Terry, you can go in now for the report.
14 (inaudible) Right. Not one word until it was like 1:30-something, Friday. You don't stand there
15 in my doorway with your dam head down and ask for my job description. You better catch a
16 clue. Fire me. You know how I'm going to show you that job description. Mmm. Let me tell
17 you something, you know how they say if you get mad (inaudible) and you don't come in here
18 approaching me like that, you better be ready, you better be ready for somebody to just come
19 right back at you or something.

20 MR. HARRIS: (inaudible)

21 MS. SNYDER: Come in here and ask for my job description. Hey, I may not be
22 no (inaudible) and I'm not no general supervisor of steel-making, but you're not gonna sit there
23 with your paranoiding self (inaudible) and then you don't talk at all and then you want my job

1 description. Tell me you understand everything, you, your behavior. You understand, you
2 created all of this. Not me. You. So, you know what I mean. And I'm not kissing nobody's
3 butt. Not even Jerry Downing. Everybody needs and works their job, but life does go on.
4 You know what I mean, and it's because Dennis Ford was asking me about my job description
5 and you feel that I'm a problem for you, you tell I'm a problem, and you do not want any
6 obligation, but being my supervisor, that is fine. That is fine. That's your thing to deal with. If
7 that's the way you feel, then you do what you gotta do. You know what I mean. And you sit
8 down laughing, you think it's all funny. You want to rowel somebody up. Well, guess what,
9 people know how to rowel you up too. Just like all these employees that run around Rowling
10 you up. You know. You know. You know they do it on purpose.

11 MR. HARRIS: Yeah, you right.

12 MS. SNYDER: And sometimes you (inaudible). You know what I mean.
13 (inaudible) well, guess what, I do too. 'Cause I get rowled up easy. But I really get rowled up
14 when somebody acts stupid or plays dumb little games. You're my boss, act like my boss.

15 MR. HARRIS: (inaudible)

16 MS. SNYDER: And, from this point on, I won't talk to you disrespectfully by
17 hollering and cussing the way I've been. (inaudible) -- one of your own employees. I have
18 done that, have I.

19 MR. HARRIS: (inaudible)

20 MS. SNYDER: No. (inaudible) -- you're my boss. A boss is a boss. I've always
21 thought, I, I might be napping, but your boss is your boss. Just like my dog is my dog. You
22 know what I mean. You know what I mean.

23 MR. HARRIS: (inaudible)

1 MS. SNYDER: So, you know. But, everything you just – fine, not ?

2 Pushing my buttons. Pushing my buttons. And everything that I did, I (inaudible)

3 MR. HARRIS: (inaudible)

4 MS. SNYDER: What bothers you.

5 MR. HARRIS: It bothers me. (inaudible)\

6 MS. SNYDER: Oh, wait a minute. The way I've been talking back to you.

7 MR. HARRIS: Yeah, yeah. (inaudible)

8 MS. SNYDER: How do you figure. What did you think my reaction is gonna be.

9 Number one, you ran out of here so fast when you told me to come to work with, with a dress

10 and no panties on. You ran out of here too fast to see what my real reaction would have been.

11 You're lucky I didn't chase you down there and (inaudible) on you in front of everybody.

12 MR. HARRIS: (inaudible)

13 MS. SNYDER: Ask me out (inaudible), ask me out (inaudible) that's one thing, but

14 that shit, that's bullshit. I don't think that's funny. (inaudible) – dirty-ass – (inaudible). And

15 then the next day you tell me not to bother to come in at all. Then Thursday –

16 MR. HARRIS: I'll tell you what –

17 MS. SNYDER: -- now, wait a minute. Wait a second. Wait a second. Then

18 Thursday you remind me not to come in at all. Wait a minute. The person you are, you forgot

19 that you done told me not to bother coming in. 'Cause you were mad over floor tiles. Here's the

20 whole picture, this is the whole puzzle, starting from last Tuesday's email.

21 MR. HARRIS: (inaudible)

22 MS. SNYDER: You've been asking me if I've been taking mail. See this, me right

23 here. I saw this (inaudible) – that's today, so you can walk me up and then I met you (inaudible).

1 You been asking me, if I've been, if I've been taking mail. Since about August the (inaudible).
2 I'm sorry. I think it was August 13th because I worked a Saturday with (inaudible) office. Jason
3 was not here for two weeks after I left. You need to look up his termination date. Remember, I
4 tracked that (inaudible). So had just said I'm trying to hurt you sending an email about floor
5 tiles. That's what really pissed me off. That made me sick to my stomach. Why would you
6 even think that. Why would you think I'm trying to (inaudible) by sending an email about floor
7 tiles. I still have the dumb email. If you look at this email, I don't see anything about Terry
8 trying to hurt me. Where do you get that. You know. You know why. That's because you're
9 feeling guilty, or you're scared. 'Cause I never went out with you. That's what it is. It's either
10 that you're scared or you feel guilty. You gotta pick one. And, especially you playing all these
11 little games for a week. Well, if I was gonna hurt ya, I would have done, this would have been
12 the week to do it. I know, and you'll laugh, and you think it's a (inaudible) transfer. We all, get
13 away from her, she's gone crazy. I really did it now. You know, you can't --

14 MR. HARRIS: (inaudible)

15 MS. SNYDER: Let me tell you something. I have let you take advantage of me
16 from day one and if I wanted to fuckin' hurt you, my tape-recorder couldn't fit in this room, it
17 would be so dam big, as much shit as you talk. And how can you tell Mr. Ford that he can't talk
18 to me about whether it's my job description --

19 MR. HARRIS: (inaudible)

20 MS. SNYDER: -- I can't, I can't. I can you tell Mr. Ford --

21 MR. HARRIS: (inaudible)

22 MS. SNYDER: There are two things. I understand that you want to say keep,
23 right, and, say, give me some money. That makes sense to me, right. At the same time, he tells

1 me, well, I'm the one, I'm the one that approves it. Now, listen to me. You guys, you guys is
2 acting like you're married couples puts me in a little spot sometimes.

3 MR. HARRIS: Right, right. (inaudible)

4 MS. SNYDER: And you know that. Now, wait a minute. No. No. Because I
5 want to mention, if you notice, I capitalize when I send you two an email. That's capitalized
6 (inaudible). You understand. I would, I gotta do what I'm told and I'm gonna do what I'm told.
7 You two need to come to some kind of agreement about it. You know. And what I've done is,
8 and what Linda Harris requested me to do is send an email and ask for supplies, what we need,
9 first, this is what I did. And then whatever she doesn't have, don't order from there. And that's
10 what I meant by the, you know, you know how I left the word, whatever Linda does not have, I
11 left the word have out. Just like you switched the word from I canceled to we canceled. So, I
12 didn't cancel. You canceled me working Saturday, I didn't cancel me. So, I mean, just little
13 minor things like that can make, this little tiny big mole hill will become a mountain. You know
14 what I mean.

15 MR. HARRIS: (inaudible)

16 MS. SNYDER: No, it's not. She sent them out over the floor tiles. And the reason
17 for being (inaudible) floor tiles.

18 MR. HARRIS: (inaudible)

19 MS. SNYDER: Sorry, Sam. We were talking about, we've been talking about the
20 floor tiles.

21 MR. HARRIS: (inaudible)

1 MS. SNYDER: You need to check (inaudible). You (inaudible) hurt you because I
2 sent email about floor tiles. That tells me I'm working for a paranoid psychopath maybe. I
3 mean, you know what I'm saying.

4 MR. HARRIS: (inaudible)

5 MS. SNYDER: Oh, so, in other words, because everybody else tells on you or does
6 this and does that to you, you think that (inaudible). I am going to tell you sexual harassment
7 startin' with fuckin' floor tile. That's what you think.

8 MR. HARRIS: I guess.

9 MS. SNYDER: And you started to sit down that day and I scared you when I
10 started to yell at you and you said is it because of the way I talk to you. So, no, I wasn't trying to
11 hurt you by sending an email about floor tiles. I wasn't trying to hurt you by telling you there's a
12 note on my car from stickin' loser from CitiSteel, fuck on that.

13 MR. HARRIS: (inaudible)

14 MS. SNYDER: And you told him no, because you don't (inaudible) from here. I
15 already know that. That's okay. You (inaudible) a lot of things.

16 MR. HARRIS: (inaudible)

17 MS. SNYDER: You can't say what, I didn't --

18 MR. HARRIS: -- I can't say that in front of you. I can't go to him in front of you
19 and say the (inaudible) wanted him to meet when he, when he got there. What I said to him was

20 --

21 MS. SNYDER: (inaudible) -- call me down there.

22 MR. HARRIS: Yeah. That's, what I said to him was --

23 MS. SNYDER: -- Terry found this on her car.

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1 MR. HARRIS: She found this on her car and you think somebody put it on there,
2 so I'm not ruling that out. I said, you know —

3 MS. SNYDER: -- that's what, those were your words.

4 MR. HARRIS: Yeah. So I said —

5 MS. SNYDER: -- (inaudible) — I don't believe you. You know how I know. I
6 don't believe that's what you said to him. Well, I'm not gonna call Jerry Downing and ask him
7 your exact words (inaudible). You know why, because you were so doubtful, yelling at me, how
8 do you know this came from here. You were yelling at me how do you know it came from here.

9 MR. HARRIS: I wanted you, I wanted you to convince me that you felt strongly
10 about that you looked in your car that morning (inaudible) —

11 MS. SNYDER: Every day.

12 MR. HARRIS: And I know you do now. Because I've heard you say it. And, yes,
13 come to think of it, I seen you from time-to-time in the back seat of your car (inaudible), in your
14 trunk.

15 MS. SNYDER: No, that's, no, that's at 5. And what I do is first thing in the
16 morning I'll let, so everything's not cold, my hat, my jacket, I take it out of my trunk. Yous
17 went out and wiped the snow off my car this morning, okay, and I said make sure you open my
18 trunk, lift it open, then open my doors and start the car up, then wipe the snow off because, and
19 he said to me, why. I said because I need to get all my gear out (inaudible) in the car my drive
20 here is warm. You know what I'm saying.

21 MR. HARRIS: Well, what I said to him was, I'm not ruling that out. I guess kind
22 of upset that he was is that (inaudible) skipped saying (inaudible) —

B-0028

1 MS. SNYDER: -- well, what if (inaudible) made a comment like that to me. Look
2 at the dumb comments you've made. Nobody's perfect. You expect everybody to be perfect and
3 think exactly like you. So, I guess you (inaudible) -- making that comment.

4 MR. HARRIS: (inaudible)

5 MS. SNYDER: (inaudible) cool. So what if he made the comment the guard is
6 stupid. What's that gonna (inaudible) -- I get it, that will reflect on you.

7 MR. HARRIS: (inaudible) -- the guard's sleeping --

8 MS. SNYDER: -- so, in other words (inaudible) -- the only time that I caught that
9 guard asleep --

10 MR. HARRIS: -- (inaudible)

11 MS. SNYDER: I never (inaudible) tell when the man's falling asleep. That's a
12 boring job.

13 MR. HARRIS: (inaudible)

14 MS. SNYDER: They didn't. (inaudible) lot to do. Like rotate the junk piles. Now
15 see, that's fine. I'm done arguing with you, too. Okay. (inaudible)

16 MR. HARRIS: I'm sorry (inaudible).

17 MS. SNYDER: I'm sorry.

18 MR. HARRIS: Really (inaudible)

19 MS. SNYDER: Oh, whoa, whoa, whoa, whoa, whoa. Don't try and mess around
20 because of your comment about (inaudible). That has nothing to do with it. I've been pissed
21 because of your paranoid thinking ever since I sent a nice, innocent, thoughtful email. That's
22 why I'm mad. Then, then, I was, I gotta a little bit madder when you yell at me because of a note
23 that somebody from here put on my car. Then I get a little bit madder, you want to cancel me

1 working Saturday. Let's see, oh, no, I'm already mad because of you canceling because you
2 were mad because you were paranoid. You understand all this. Then I get mad because you
3 want my job description after running around like a big baby not talking to me all day.
4 (inaudible) – you knew what buttons of mine to push. You know how to make somebody mad.
5 Just like these people know how to make you mad. Nobody's perfect. Look at this shit I've put
6 up with you. Do you see me like goin' home crying, freakin' out. And then you come in here
7 say this is, after going (inaudible), right, you come in here the next morning (whispering) – then
8 you're laughing because you come in my office, the intelligent, the highly intelligent man that
9 you are, you gonna come in my office acting dumb and telling me I'm sorry, I didn't realize I
10 was (inaudible). Listen to that. And I said don't bother apologizing 'cause it ain't gonna stop.
11 Did it. No. Do you see me freakin' out. Do you see me sending (inaudible). You know what
12 I'm saying. Nobody's perfect. You're not perfect. So what if the dam guard did fall asleep.
13 That's part of life. I guarantee, Jerry Downing, he probably got the biggest (inaudible) in his
14 closet out of everybody that (inaudible) because he wants everything – he's here four in the
15 morning (inaudible) at four in the morning (inaudible). Now, tell me you don't have nothing
16 better to do. But that's good because he fuck has anything to do. He wants to make sure
17 everybody's abiding by the rules. I guarantee that man (inaudible) because you are. I know I
18 have.

19 MR. HARRIS: (inaudible) (laughter)

20 MS. SNYDER: Oh, I stopped (inaudible) Wait a minute, no, no, no. See, you
21 (inaudible).

22 MR. HARRIS: (inaudible)

B- 0030

1 MS. SNYDER: What are you talking about. Oh, no, no, no. Oh, wait a minute,
2 wait. If you're talking about my door being shut, you know why, well (inaudible). Even though
3 I've always, you've said it before, right, so, like, I was (inaudible), it's still very (inaudible) --
4 go back and kiss me. I mean, I can't even let my dogs (inaudible), like, when they go to kiss me,
5 you know, you know how you're kids (inaudible), but, I mean, it so, and I have to, I use my
6 mirror. So I'll shut my door, what am I supposed to do, sit there and (inaudible) door like I'm
7 paranoid and request (inaudible). So I shut my door and I gently blow my nose and, you know,
8 I, I have to keep my system cleaned out. So (inaudible)

9 MR. HARRIS: (inaudible)

10 MS. SNYDER: Well, maybe you should just stop being paranoid and, you know.
11 If I do something wrong you just tell me, that's all.

12 MR. HARRIS: (inaudible)

13 MS. SNYDER: You couldn't think I'm trying to hurt you by sending a floor tile
14 email. 'Cause that ain't, if I wanted to hurt you, I wouldn't send no dam floor tile email. And
15 then you still acted up. You still acted weird. You know. I just, I didn't get it.

16 MR. HARRIS: (inaudible)

17 MS. SNYDER: You just keep startin' with me and I figured if you don't want me
18 working here 'cause you're worried about me, well, then, that's fine and you need to say so.
19 You can't have me come in here everyday arguing with me or ignoring me. I don't that's not
20 right either.

21 MR. HARRIS: What I gonna ignore you (inaudible)

22 MS. SNYDER: (chuckle) -- All right. All right.

B- 0031

1 MR. HARRIS: (inaudible) – I ain't gonna make no promises, but maybe

2 (inaudible) -- I may try send an email on Monday to have (inaudible) --

3 MS. SNYDER: -- hey listen, I don't

4 MR. HARRIS: -- (inaudible) – emails or (inaudible) the next weekend when there

5 ain't nobody here and maybe if I'm not here, maintenance will be, and you can come in and

6 retype all of the revisions --

7 MS. SNYDER: (inaudible) I will do whatever it is I am told, but when it came to
8 that pile, I was doing, wait a second now, I was doing (inaudible) what I thought was best. And

9 as far as the (inaudible) that fell, I'll show you emails monthly that I sent out to individuals, I'm
10 not gonna tell, I don't, I don't --

11 MR. HARRIS: (inaudible)

12 MS. SNYDER: -- including you. But I'm not just gonna tell on 'em, but you're my

13 boss. And just like I told Jimmy, if you want to know who's shitful, here's the thing. I even

14 have to (inaudible) for Jimmy. And I even have to reach (inaudible) because he's (inaudible).

15 So, nobody's perfect. But I'm not a tattletale and I'm not just gonna tell on people who

16 (inaudible) I try and do, this is my job, and I try to touch base about the (inaudible). I can't make

17 nobody do nothin' and, and, and what I said to (inaudible), I said I can't baby-sit everybody. He

18 said well that is kinda part of your job. (inaudible) and watch over (inaudible). Yes, that is true

19 (inaudible), but I can't (inaudible).

20 MR. HARRIS: But you do a good job (inaudible).

21 MS. SNYDER: And then, and then they all come in here calling me bitch and nag,

22 you know. And I can deal with that, it's no big deal. I've been called worse (inaudible), but I

23 don't want to see nobody get in trouble. So, and I like certain, I don't have --

B- 0032

1 MR. HARRIS: -- (inaudible)

2 MS. SNYDER: -- I don't mind doing --

3 MR. HARRIS: (inaudible)

4 MS. SNYDER: I don't mind doing the (inaudible), you know what I mean. What,
5 I just don't know what more to do about (inaudible). I made him promise me three times
6 yesterday, that they were gonna bring it to me today. It's all done. (inaudible) -- Did they bring
7 it, no. Another person was just in here a little while ago, was supposed to go over a job
8 procedure with me. Told me that two days ago. They said tomorrow we'll go over it, which was
9 yesterday. Have they. No. So what do you want me to do, do you want me to send you all these
10 emails on who did, who's not doing what and who's doin. Do you understand what I'm saying
11 to ya.

12 MR. HARRIS: (inaudible)

13 MS. SNYDER: Well, you know. You're dam right I'll work a dam Saturday. But
14 once you, don't care what you say to me, 'cause I'm not scared of you. I don't care if you're
15 talking about a dress with no panties, I don't care if you're talking about blowing up the place,
16 okay. You know, we live in fear. You know, you never know what's gonna happen next. But
17 once you cancel on me because you're mad and your attitude, no, I'm not gonna come in that
18 weekend. No, I'm not. I was hoping you'd ask (inaudible) -- still wanna work Saturday. Hell,
19 no. Hey, I've been sittin' at home bitchin. Just outside this morning, I would have (inaudible) --
20 because you took away my little bit of the overtime because you got paranoid over floor tiles
21 emails. You know what I mean. And this is childish and too much and all of a sudden you just
22 wanna create all these arguments either because you feel guilty or you feel scared. So, but that's
23 your problem, you're not gonna take them out on me.

B- 0033

1 MR. HARRIS: (inaudible)

2 MS. SNYDER: Maybe both. I don't know. But you're not gonna take them out on
3 me. You know. And I don't feel like sittin' around arguing with my boss or talkin' bad to him.
4 And raisin' my voice to 'em.

5 MR. HARRIS: Now I'll go back to listening and being quiet when you yell.

6 (inaudible) – I been stickin' up for myself. No. No.

7 MR. HARRIS: (inaudible)

8 MS. SNYDER: Oh, how. I been stickin' up for myself. How.

9 MR. HARRIS: (inaudible)

10 MS. SNYDER: (inaudible) – you think, or you're scared that I'm gonna yell
11 something. Or somebody else is gonna overhear.

12 MR. HARRIS: (laughter)

13 MS. SNYDER: That's why you do that.

14 MR. HARRIS: (laughter) I gotta make my rounds. Yep. (inaudible)

15 MS. SNYDER: Listen, do you have anything else to go up to the hill because when
16 I'm done these cards – (inaudible) – one hundred –

17 MR. HARRIS: Go ahead and (inaudible).

18 MS. SNYDER: Well, I just wanna finish these three cards.

19 MR. HARRIS: (inaudible)

20 MS. SNYDER: No (inaudible). Three cards I have left to do.

21 MR. HARRIS: All right, I'll see you later. You have a good weekend.

22 MS. SNYDER: And you have a safe weekend too.

23 MR. HARRIS: I wanna tell ya, I'm really sorry (inaudible).

1 MS. SNYDER: About what. Okay.

2 MR. HARRIS: A lot goin on (inaudible)

3 MS. SNYDER: You know, it's all right.

4 MR. HARRIS: I'll work on it (inaudible). All right.

5 MS. SNYDER: Yeah, I apologize for yelling at you, too. Especially in front of

6 someone.

7 MR. HARRIS: That's all right.

8 MS. SNYDER: (inaudible talking) Seven, four. Oh, shoot. What I put on there.

9 No. Okay. (inaudible) that's, let me take that off. Harris. (inaudible sounds and shuffling

10 around). Oh, well, let's see what today is. The 17th, twenty-five after three. My babies are

11 ready (inaudible). Uh-oh. There we go. (humming) All right. (inaudible sounds) Oh, my god.

12 Oh, my goodness. (inaudible) All this loud noise. (inaudible) All right. (chuckles)

13 (inaudible) All right. They're you go. Whew. Whoa. Come on. All right. I see you're still on.

14 (end of tape)

B-0035

Snyder, Terri

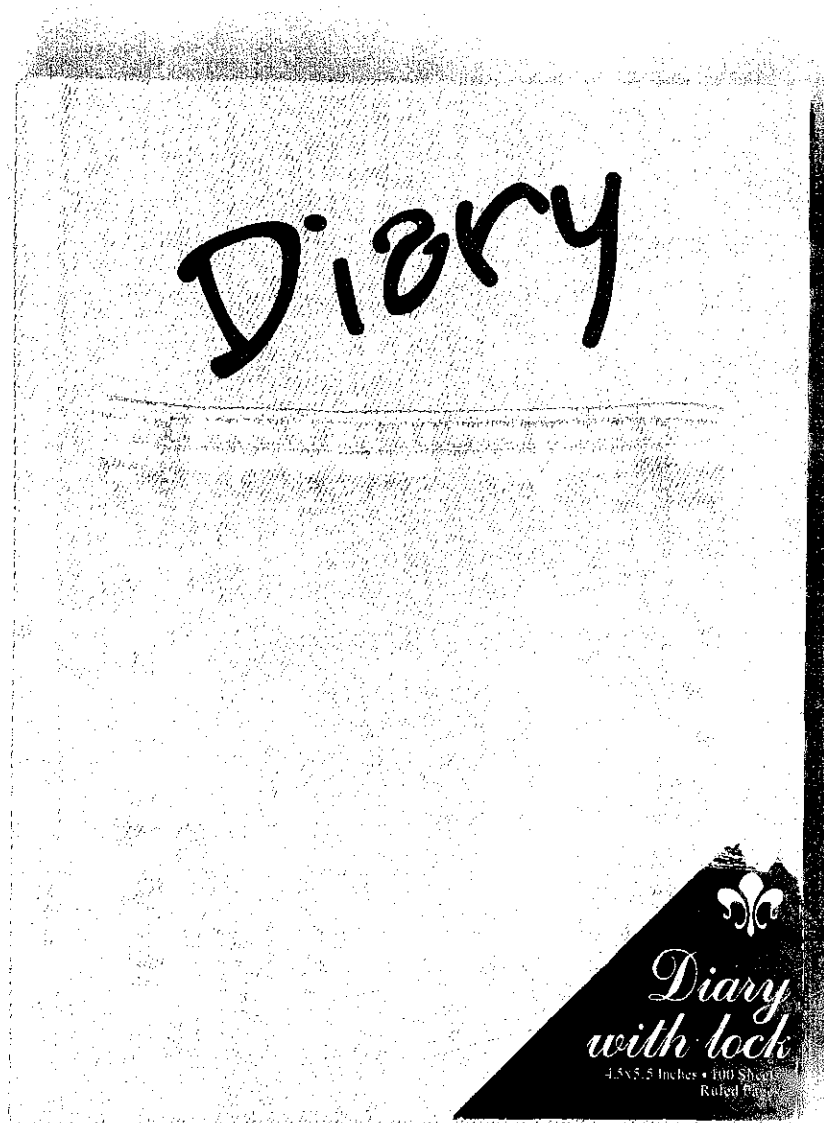
From: Snyder, Terri
Sent: Monday, April 07, 2003 12:30 PM
To: Casters; Melters; Hicks, Joe; Rineer, Jim; Zalota, Stanley; Buragino, Greg
Cc: Buragino, Greg; Ford, Dennis; Gimmy, John; Harris, Randolph
Subject: iso bks
Importance: High

Good Afternoon To All,

This email is to inform you that last week after I sent the email on 4/1/03 in regards to ISO procedures, I was requested to begin distribution of every ISO procedure as soon as the start up was returned back to me....I am no longer to hold on to 1 procedure and wait for at least 2 to 3 more like I was instructed to do and have been doing since the beginning of my employment. So this means for me to be able to do as I am told / for me to be able to do my job, you (s) must work with me....if you (s) could be so kind & understanding please. For now on when I request the Meltshop Procedures Manual, I will need it A.S.A.P., which I will be requesting it more often. I apologize for any inconvenience and I appreciate your time and understanding of the change.

Thank You All Very Much,
Terri

Had interview for part-time job on 4-1-03
 Tuesday - Well as ^{Wed} 4-2-03 ^{Thursday} 4-3-03 Thursday
 Randolph came in and told me not to
 tell Pat, he & Tic were talking they need
 help in Maintenance - Now they want to
 offer me over time? - He told me Tic is
 gonna ask Tic - Tic may approach me -
 act surprise - I informed Randolph I had
 just had an interview for a part-time job -
 He said he will miss me if I leave - Please
 don't go - I need you here - and your glow.



Monday April 7, 2003
My Momma handed this to me (she forgot she had bought it last week) after leaving me tell my Aunts that I am going to buy a CITISTEEL - Randolph House - Sex HAR. BOOK, she got up & said, "I forgot I had this for you since you were over James all weekend," But she asked, "will this do?" Yes, I replied - this is perfect, thank you, I Love My Momma she is so kind Hearted - Poppa is too - they are where my kind heart comes from - that is why (one of the reasons) I didn't tell when all of the following began back 2001
on August 14th (Saturday)

Saturday

8-8-4-01


Mr. Randolph Hains
walked me out to the parking
lot @ 1 PM ... when we got out to
the changing room he stopped
and I am gonna take you
out for a beer sometime,
and then he asked if I
want to stay and be a City
employee? ... I said let's
wait and see, make sure
I like it and do well ...
and see if I can over
come my fear of
heights.

8-6-01 ~~Saturday~~ Monday

Mid morning

Mr. Hains said, "You really
brighten up this place".


I thought to myself I
guess so I am the only
female and this is a dirty
ass place.

 Saturday


Date 8-11-01


Mr. Harris walked me
out to the parking lot at 3 PM
and says, "I haven't forgotten
about that beer". I thought
to myself 'I O.I.O'.

8-20-01 Date Monday



Randolph starts
his week off paying
me a compliment, "You
really make this place
glow," he says.

 Saturday Date 8-26-01
Mr. Harris is a
very nosey man... he
asks me alot of personal
questions,

9-10-01 Date  Saturday
Mr. Harris
continues to push the
issue of me becoming
a CitiSteel employee.

Saturday

Date 9-15-01

Randolph
looks at me w/a
smile ear to ear.

9-17-01 Monday

Today, I became
a C&S Steel employee -
I knew I was getting my
picture taken for my I.D.'s
so I got up early to put on
makeup since I am not
very good at it. Randolph
looked at me like he never
saw a female before. He
complimented me several
times throughout the day
about how beautiful I am.

November 26, 2001 - Monday
Mr. Harris asked,
(which he would often) "how was
your weekend"? ... I told
him my boyfriend took
me to the mountains.
He said, "I wish you would
let me take you away one
weekend".

~~9/3/03~~
~~3/21/03~~
He apologized
He said to many
emotional
feelings
for me

3/21/03 - He informed the reason
 he wants the employees to
 not ask my assistance is because
 he has these unexplainable emotions
 for me, I can't take him
 hanging over me sniffing &
 brushing up on me - his hand is
 gonna get hurt if he keeps fucking
 w/me

Hoover's
 Phone Man

B-0045

PST Office

P-0058

Bank - Mail desks

4-9-03 - They told Randolph -
 They followed me in their vehicles
 not to go back up there begging
 me to please take the rest of the
 day - no reason they would give me why
 they want me to transfer - J.D. called me 3 times
 while I was up there

Snyder, Terri

From: Snyder, Terri
 Sent: Tuesday, January 07, 2003 10:47 AM
 To: Ryan, Jim
 Cc: Harris, Randolph; Ford, Dennis
 Subject: SAFETY HAZARD

Mr. Ryan,
 I thought it would be best to let you know before someone gets hurt, the floor up here in the meltshop office is coming apart tile by tile.....I for one tripped, but caught myself the next employee may not.

Thanks for your time, Terri

reading his copy of this email prior to Randolph
 he took me in Ford's office (after
 1-11-03, Ford said okay to asking me to go to Ford's w/him
 was in my office prior to asking me to go to Ford's w/him
 he came in and said "Do you want to work
 Saturday?" I said "yes" he started to
 walk towards the door, I said "no panties"
 I get so pissed off and he thinks it is funny to
 and he dashes out laughing really makes me sick to
 my stomach, he does that before I can yell at him
 that mother fucker is lucky I don't yell at
 him as his ass flying down the hall... he
 would shit if I did that w/someone else
 in there office... he would so scared
 thinking I am going to yell/tell
 the shit he says & does.

B-0046

P-0285

① 4-7-03 MONDAY - 9:05 am - R H brought stop card into me - I kept working and held my hand out in the air w/ an open palm, he slid the cards across my hand and ~~he~~ laughed - I said you could of cut me - He said I wouldn't do that - I said a 'paper cut' - so he finally handed them to me and asked what do I do to my hair, it stays put however I put it - Hairspray works I said 'It looks good however you do it as he walks out. 9:07 am here he comes for a piece of candy as he put it (^{It was a bag of cough drops}) well at 9:28 am (His 7th piece of candy) when he ^(around his 5th he grabbed my cell) marched in saying he needs more, I picked the bag of cough drops up and clutched them in my fist and told him to get the fuck out and take them. 9:31 am He walks in and says pretty woman as he picks up my phone, I gave him an evil look and he quickly responds w/ I wasn't talking to you, I thought to myself then who in the fuck were ya talking then. He stood there w/ my receiver to his ear staring down at me, he asked how I was and how is your Mom and for the second -

②
Time this morning he asks how was
my weekend, I am looking already, I
felt like literally kicking him the fuck out
of my office.

P-0057

B-0048

FEB 2003 IS THE
ONLY MONTH - HE
BACKED OFF -
ASSHOLE

P-0060

B-0049

Date: March 3, 2003
To: Terri Snyder
From: Greg Buragino
Subject: Unacceptable Attendance and Work Performance

As we discussed last Friday, February 28, 2003, in a meeting with Randolph Harris and Dennis Ford; your attendance and work performance have been unacceptable to the company and must improve immediately. During the past several months and on several occasions, Randolph Harris and Dennis Ford have discussed these two subjects with you. However, you have not improved.

During 2002, you missed 13 days and this year you have already missed 2 days.

During the past several months, your work performance has deteriorated resulting in your not getting your work done on a timely basis. You have been shown how to perform tasks repeatedly and you have required additional instruction.

You have been using the phone too much with regard to personal matters. Per Company policy, you are not permitted to use the company phone for personal reasons unless you have an emergency.

You have stated that someone put a sticker on your car and wrote graffiti about you on a wall. Following investigations, we have concluded that there is no evidence that these things happened at CitiSteel.

You have complained about being afraid of heights. If you cannot tolerate heights and feel endangered, please contact me immediately.

The purpose of the meeting last Friday was to formally discuss all of the issues above with you to ensure that you understand that your attendance and work performance are unacceptable to the Company. We suggest that you focus more on your work, follow directions, perform the work that you are assigned and on a timely basis.

Failure on your part to improve your attendance and work performance immediately and on a sustained basis will result in disciplinary action that may include termination from the Company.

Cc: Randolph Harris
Dennis Ford
Personnel File

Terri Refused to Sign - DFord, 03-11-03
Terri refused to sign, due to poor work performance
Randolph Harris 3-11-03